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CHRISTIAN FLORES

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:22-CR-00168-JAM-1
11 Plaintiff,)
12 vs.) STIPULATION REGARDING EXCLUDABLE
13 CHRISTIAN FLORES) TIME PERIODS UNDER SPEEDY TRIAL
14) ACT; ORDER
15 Defendant.)
Date: October 18, 2022
Time: 9:30 a.m.
Court: Hon. John A. Mendez

16 **STIPULATION**

- 17 1. By previous order, this matter was set for a status conference on October 18, 2022.
- 18 2. By this stipulation, Defendant Christian Flores now moves to continue the status
19 conference until January 24, 2023, at 9:00 a.m., and to exclude time between October 18,
20 2022 and January 24, 2023 under Local Code T4.
- 21 3. The parties agree and stipulate, and request that the Court find the following:
- 22 a) The government has represented that the discovery associated with this case as been
23 produced to counsel.
- 24 b) Counsel for defendant desires additional time to review the discovery, consult with
25 her client, conduct defense investigation, discuss potential resolution options, and
26 otherwise prepare for trial.
- 27 c) In addition, Mr. Flores has been attending substance use treatment since his release at
28 Wellspace, and does not anticipate completing the program until December.

- 1 d) Counsel for Mr. Flores believe the failure to grant the above-requested continuance
2 would deny him the reasonable time necessary for effective preparation, taking into
3 account the exercise of due diligence.
- 4 e) The government does not object to the continuance.
- 5 f) Based on the above-stated findings, the ends of justice served by continuing the case
6 as requested outweigh the interest of the public and Mr. Flores in a trial within the
7 original date prescribed by the Speedy Trial Act.
- 8 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et
9 seq., within which trial must commence, the time period of October 18, 2022, to
10 January 24, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §
11 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted
12 by the Court at defendant's request on the basis of the Court's finding that the ends of
13 justice served by taking such action outweigh the best interest of the public and the
14 defendant in a speedy trial.

15 Dated: October 14, 2022

HEATHER E. WILLIAMS
Federal Defender

17 /s/ Meghan McLoughlin
MEGHAN MCLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
CHRISTIAN FLORES

20 Dated: October 14, 2022

/s/ Justin L. Lee
JUSTIN L. LEE
Assistant United States Attorney

23 **ORDER**

24 IT IS SO ORDERED this 14th day of October, 2022.

26 Dated: October 14, 2022

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE